

INTERVENOR MICHAEL ROSKEY'S COMMENTS REGARDING
PRESIDING MEMBER'S PROPOSED DECISION AND SUGGESTED
CONDITIONS COSUMNES/SMUD 01-AFC-19

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Despite the possibility of error (and an error is implicit due to the lack of scientific evidence in the record concerning the affect of differences in ammonia emissions between that which would issue from a SCR catalyst designed for a 5 ppm ammonia slip or a 10 ppm ammonia slip or the concentration of suspended coarse, fine and ultra fine particulates) the Commission chose to weigh the cost to the project owner over the possible injury to public health. In other words, the Commission elected not to require the best possible emission controls due to cost!

The Commission also chooses to weigh the cost to the project owner of the wood stove retrofit program deciding it was too costly to require the applicant retrofit wood stoves in spite of the possible benefit to the public health that would result from the reduction of suspended, particulate matter in the ambient atmospheres.

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The Commission, however, notes that the record does not have an adequate exposition of an estimated current or projected population growth in the area of the proposed power plant.

01-AFC-19

CALIF ENERGY COMMISSION

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The visual impact of the proposed project combined with the impact of the cooling towers from the Rancho Seco Nuclear Plant is significant. The project owner shall remove the existing twin cooling towers of the Rancho Seco Plant.

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Adequate fire protection would require a full time firefighter truck and ladder combination and haz-mat trailer. The project owner shall provide funds to the Herald Fire Department to acquire and maintain this equipment and to hire and train such fire fighting personnel.

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Delete second sentence: "The Commission believes that..."

"The Commission concludes that ..."

No definition of a wall surrounding this facility."
Better definition.

REVISED AND REPLACING PREVIOUSLY DOCKETED
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At the end of the fifth paragraph, after the sentence ending " ... does not require its imposition ... ," add the following:

Despite the possibility of error (which is implicit in the lack of scientific evidence in the record concerning the effect of differences in ammonia emissions on the concentration of suspended coarse, fine and ultra fine particulates in the ambient atmosphere between what would issue from a SCR catalyst designed for a 5 ppm ammonia slip and what would issue from a SCR catalyst designed for a 10 ppm ammonia slip), the Commission chose to consider more serious the cost to the project owner over the possible injury to public health.

In other words, the Commission elected not to require the best possible emission controls due to cost!

Further:

The Commission also chose to consider more serious the cost to the project owner of the wood stove retrofit program over the possible benefit of the reduction of suspended, particulate matter.

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At the end of the second paragraph, after the sentence ending " ... significant impact on public health ...," add the following:

The Commission, however, notes that the record does not contain an adequate exposition of an estimated current or projected population growth in the area of the proposed power plant.

Whatever impacts are estimated by the models used to analyze the effects of particulate matter emissions can support no reliable conclusions concerning the effects on public health without corresponding estimates of affected population unless, incredibly, the Commission concludes that there will be no impacts whatsoever. Even if the effects are considered insignificant, without an estimate of population in the affected area, it is unlikely that any clear projection is possible concerning cumulative impacts of population and emissions from the proposed power plant.

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Under "SURFACE TREATMENT OF PROJECT STRUCTURES AND BUILDINGS," add the following condition:

The visual impact of the proposed project combined with the impact of the cooling towers from the Rancho Seco Nuclear Plant is significant. The project owner shall remove the existing twin cooling towers of the Rancho Seco Plant before beginning the commissioning and start up of the proposed power plant.

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Under the heading "CONDITIONS OF CERTIFICATION," add the following condition:

Adequate fire protection would require a full time firefighter truck and ladder combination and haz-mat trailer. The project owner shall provide funds to the Herald Fire Department to acquire and maintain this equipment and to hire and train such fire fighting personnel.

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Before the second sentence of the second finding beginning with the words " ... The Conditions of Certification also assure ... ," insert the following:

"The Commission believes that..."

It is not at all clear from the record that an unqualified statement can be made based on the evidence.

Define the phrase " ... area surrounding the facility ..." used in the third finding. With no adequate definition, and several are used in the record of the Committee's hearings on the application of the project owner, it is impossible to arrive at any conclusion concerning the accuracy of this statement.

Before the sentence contained in the fourth finding, beginning with the phrase " ... The record does not establish ... ," insert the following:

"The Commission concludes that ..."

It is not at all clear from the record that an unqualified statement can be made based on the evidence.